DOCUMENT RESUME

ED 193 469 CE 026 768

TITLE Difficulties Encountered and Potential for Technical Assistance in Developing Three-Year State Plans in Adult Education.
INSTITUTION Development Associates, Inc., Arlington, Va.
SPONS AGENCY Office of Education (DHEW), Washington, D.C. Office of Evaluation and Dissemination.
PUB DATE 17 Dec 79
CONTRACT 300-78-0469
NOTE 29p.; For related documents see CE 026 767-769.

EDRS PRICE MF01/PC02 Plus Postage.
DESCRIPTORS *Adult Education; Adults; Agency Cooperation; Consultants; Cooperative Planning; Coordination; Delivery Systems; Educational Legislation; Federal Aid; *Federal Legislation; Federal State Relationship; Grants; *Long Range Planning; *Master Plans; Models; Needs Assessment; Participation; School Districts; State Departments of Education; *Statewide Planning; *Technical Assistance
IDENTIFIERS *Adult Education Amendments 1978; Adult Education State Plans; California; Delaware; Kansas; Louisiana; Mississippi; New Jersey; New Mexico; Office of Education

ABSTRACT

This report focuses on the areas of difficulty encountered by states in developing their three-year Adult Education State Plan required by the Adult Education legislation of 1978. It highlights those areas when technical assistance from the United States Office of Education is warranted. Findings and recommendations are based on the Division of Adult Education's (DAE) interviews with adult education state and local staff and observations of the critical processes and events which transpired during the planning process in a nationally representative sample of seven states: California, Delaware, Kansas, Louisiana, Mississippi, New Jersey, and New Mexico. The first chapter is an introduction. Chapter 2 describes five types of technical assistance provided to the states through DAE: (1) model for participating in developing and carrying out adult education state plans, (2) regional meetings, (3) state plan development specialist, (4) draft regulations, and (5) national conference. Chapter 3 discusses difficulties encountered in planning as a result of the new legislation, including participatory planning, needs assessment, services expansion, interagency cooperation and collaboration, and local education agency (LEA) vs. non-LEA grants. The final chapter presents seven recommendations formulated by the DAE as a result of observations and discussions regarding the state plan development process. (YLB)

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DIFFICULTIES ENCOUNTERED AND POTENTIAL FOR TECHNICAL ASSISTANCE IN DEVELOPING THREE-YEAR STATE PLANS IN ADULT EDUCATION

Submitted to:

Office of Education and Dissemination/USOE
Under Contract No. HEW 300-78-0469

U S DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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December 17, 1979

CE026768

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I. INTRODUCTION AND PURPOSE

The adult education (AE) legislation of 1978 has been described as a mandate for expansion. These amendments to the existing Act expanded the definition of persons eligible for program services and modified state planning requirements. As conceived by USOE and other supporters of the new legislation, implementation of these changes was to be facilitated by one-year planning grants provided to state departments of education. According to HEW Secretary Califano: "these grants would facilitate a participatory process for identifying literacy needs within the state and the development of a coordinated strategy to meet those needs, involving local education agencies, businesses, industry, community organizations, and other institutions."

As the legislation was finally approved, however, not only were the planning grants not forthcoming, but the states had only eight months in which to develop and submit their first three-year plan. To be assured continuity of federal funding, most State Plans were judged "substantially approvable" by July 1, 1979. In effect, this meant the plans were to comply with all relevant aspects of the new legislation and also conform to federal regulations which were being written at the same time the plans were being developed. Thus, instead of the initially envisioned thoughtful and comprehensive planning process, the states were put in the position of compressing what is ideally a two to three-year participatory process into three or four months. Coupled with these new planning requirements and lack of federal regulations throughout the

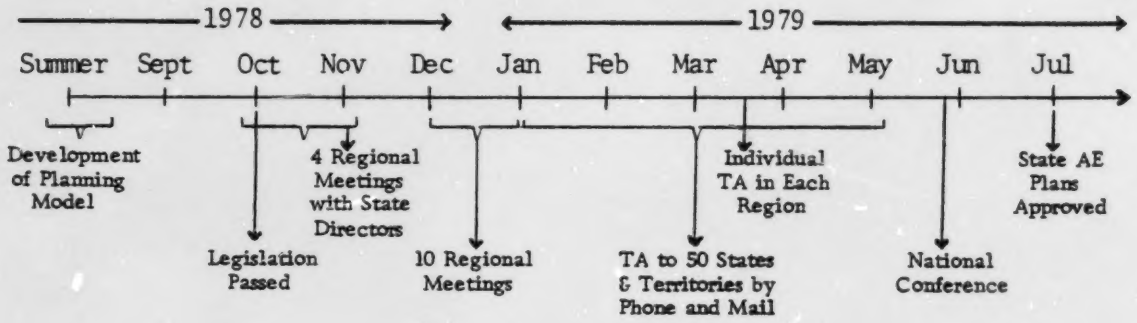
planning process, was the recentralization of the ten regional specialists of the Division of Adult Education (DAE) to the central office in Washington, D.C.

This report focuses on the areas of difficulty encountered by states in developing their three-year AE State Plan and highlights those areas where technical assistance from USOE is warranted. The findings and recommendations are based on DA's interviews with AE state and local staff and observations of the critical processes and events which transpired during the AE planning period in a nationally representative sample of seven states: California, Delaware, Kansas, Louisiana, Mississippi, New Jersey, and New Mexico.

II. DESCRIPTION OF TA PROVIDED

Given the need for the states to submit substantially approvable state plans to USOE within eight months after passage of the amended Act, the DAE began to alert the states in the fall of 1978 and to plan for coping with the situation. The State AE Planning Events Timeline shown below graphically portrays the sequence of events from just prior to the passage of the new legislation up to the submittal of the states' AE three-year plans.

STATE AE PLANNING EVENTS TIMELINE



As illustrated above, prior to enactment and during the eight-month planning period five types of technical assistance (TA) were provided to the states through DAE:

A. A Model for Participating in Developing and Carrying Out Adult Education State Plans

While the new legislation was being formulated during the summer of 1978, the DAE commissioned the design of a participatory planning model which could assist states in the development of an

approvable AE three-year plan. This model, designed by Warren L. Ziegler, was presented to State Directors of AE in each of four regional meetings held in October and November. The model includes a set of five major blocks of activities to be orchestrated by the State offices of adult education. These activities are recommended steps to implementing a participatory planning process and are as follows:

- Gaining understanding and support at state government level;
- Formation of a steering committee;
- Convening the Participating Planning Conference;
- Initiating local level participating planning; and
- Reconvening the Participating Planning Conference for action planning.

A major difficulty encountered with the model was the period of time required for implementation. To gain maximum results, a minimum of one year is required, with a period of two or three years more appropriate for full implementation.

B. Regional Meetings

Four, three-day, regional meetings with the State Directors of AE were held in October and November, the first two taking place before final copies of the legislation were available. During these meetings, the critical mandates in the amended Law were presented and discussed along with current USOE interpretations. The purposes of these meetings were to help the state directors understand the requirements in the legislation, to stimulate their beginning the planning process as quickly as possible, and to obtain inputs to the federal regulation writing process. Initial confusion and frustration regarding the new amendments and their

implications in the development of an "approvable" AE plan were expressed by many State Directors, and many maintained that they were already complying with the new mandates but without documentation.

Preliminary drafts of regulations were presented and discussed during the meetings. In response, the National Council of State Directors of Adult Education identified a series of major concerns, primarily focusing on Section 306 of the Act which describes the requirements of the State Plan. Specifically, they were concerned with how the new regulations would define:

- participatory planning;
- expansion of services;
- use of funds for child care and transportation;
- bilingual education; and
- evaluation criteria.

However, the primary concern of the State Directors was having to develop a three-year plan utilizing a participatory process without any federal regulations and under an impossible time frame. The extremely limited time available for implementing the new state planning requirements overshadowed all other concerns. It was universally felt that there was not enough time to develop well-conceived three-year plans in full accord with the spirit of the new legislation.

Following the four meetings with State Directors, DAE held a series of public meetings from December 10-15, 1978. One meeting was held in each of the ten HEW regions with everyone concerned with AE invited to attend and present their views. Besides informing the public about the new legislation, DAE wanted to gather comments on five specific issues. The collective comments were to

provide insight and direction to DAE in writing the Regulations. Of special concern to the regional participants was the prospect of making the AE grants competitive and opening them up to private or public nonprofit organizations. It was believed by many participants that this new direction would be a destabilizing factor in most communities since a substantial effort had been recently spent building a stable delivery system through local educational agencies.

C. State Plan Development Specialist

A single DAE staff member was assigned to provide technical assistance (TA) in state plan development to the 50 states, territories and District of Columbia. The specialist's availability to the states was announced in November and he was available for telephone and written consultation from then on. It was several months, however, before some of the State Directors of AE utilized this source of assistance. In order to provide more personalized assistance, the DAE specialist scheduled meetings with State Directors on a regional and one-to-one basis throughout March and April. In addition, some directors visited the specialist in Washington and many hours were spent on the WATS line providing clarification on various aspects of the Act, the proposed Regulations and how the State Plan should address each.

A weakness of the TA provided was that the State Directors, for the most part, were mandated to address the legislative issues without being instructed "how to" address them. Given the limitations of time and resources, quite understandably, the TA provided focused on preparation of acceptable planning documents, rather

than on assisting the states in designing and implementing a new planning process which included greater public involvement and interagency coordination of activities and resources. To provide this type of assistance would have required a larger staff, and, perhaps, a more extended period of time than, was available to DAE.

Staff in each of the seven states studied received some assistance from the DAE specialist. In each case, the help was appreciated and reported to have been worthwhile.

D. Draft Regulations

As soon as they were developed, DAE distributed a set of draft regulations to State Directors. This was in late February and the intent was to provide further guidance as to the requirements in the development of the state's three-year State Plan. In compliance with new USOE policy designed to reduce the volume of federal regulations, the draft regulations did not incorporate the Act but were prepared to be used in conjunction with the Act. Due to the late arrival of the "draft regulations," some states did not incorporate them into the development of the new three-year plan or their participatory planning process. Most states had already developed a participatory planning strategy by this time, and for better or worse had a "draft" plan or parts of a plan already developed.

E. National Conference

A three and one-half day conference was held for all State Directors at the Ramada Inn, Alexandria, Virginia, in late May. By this date, most state plans had been completed and some were submitted to USOE. Therefore, the conference could not provide

any direct assistance or guidance in the development of each state's planning process. However, the conference did provide State Directors an opportunity to share approaches to the new legislation for future planning purposes and to discuss and reflect on the major impediments encountered in developing the current three-year plans.

In summary, as soon as the timing and requirements of the new legislation became apparent, DAE began a process designed to alert and assist the states to cope with the new requirements. Beyond communicating DAE's current interpretation of the "letter of the law," however, the TA provided by the DAE to the State Directors and staff had little impact on the development of each state's three-year plan. For the most part, there were insufficient time and resources to have an impact on the substance of the planning process. In most states, the AE planners were operating "in the dark," hoping that their interpretations of the new requirements would qualify their plan as "approvable." Presented below is a summary of the particular problems the states encountered.

III. DIFFICULTIES ENCOUNTERED IN PLANNING AS A RESULT OF THE NEW LEGISLATION

The following set of concerns were expressed by the staff, State Directors and others involved with AE who the DA staff interviewed and observed in seven states during the State Plan development process. A majority of these concerns may be addressed, and in many cases alleviated, through technical assistance provided by the DAE.

A. Summary of Difficulties

An overriding problem for all states was a general feeling of a lack of direction and interpretation of the changes implied in the new amendments. In many states, the start-up of the planning process was delayed by several months as a result of: (1) the total lack of guidelines, and (2) little, if any, TA as a result, in part, of the recentralization of the AE regional personnel. As expressed by many AE state staff, "...the first and foremost principle of introducing change had been violated by HEW/OE." In most instances, those whom the new legislation would directly effect felt they had not been informed, nor had input been solicited in regards to the proposed changes. Accompanying these general problems were a series of specific difficulties identified as impediments in developing a comprehensive three-year State Plan:

- Implementing participatory planning;
- Conducting a needs assessment;
- Assuring supportive services (including child care and transportation);

- Securing interagency cooperation and collaboration; and
- Awarding non-LEA vs. LEA grants.

B. Participatory Planning

The new amendments state that the State Plan should describe how representatives of both public and private entities concerned with AE "have been involved in the development of the plan and will continue to be involved...". Whether this involvement is to be at the state level or local level and the nature of the involvement is not defined. Specific guidance on how the representatives are to be selected and how they are to be involved was not provided. A great deal of confusion was generated as a result and led to a variety of interpretations on the part of each state. In some, the participatory planning task requirement was delegated to the local level by requiring local grantees to show evidence of input from labor, voluntary organizations and other groups identified in the new legislation. Several other states kept the process at the state level developing a participatory planning council, which in some ways is a duplication of the State Advisory Council and complicates the planning process.

A hinderance in some states to meeting the participatory planning requirement was the unavailability of resources to carry out the planning at the local levels. In many states, the availability of state AE staff to assist the local staffs was extremely limited both in terms of time and money. These limitations, according to state AE staff, were due to "working more than full time to cover additional duties (because of the new regulations)"

and woefully inadequate travel budgets. The strain being placed on the AE staff and budget may ultimately affect the delivery of services in the other AE component areas.

While most felt the Ziegler model was "neither realistic nor acceptable" under the existing conditions, they did express a need for guidance in the design of a participatory planning process which would include steps to follow, training of facilitators, designing planning tools, etc. Even more significant was everyone's request that sufficient time be allowed to develop and implement the process as well as to allow for feedback to the participants. As a minimum, a one-year time period would promote a more involved and cohesive participatory planning process.

Two serious hinderances to the planning process involved: (1) how to involve those groups mandated for participatory planning, and (2) the extent of their involvement in the planning process and in continued operations. Relevant to this, the states need to know what is an acceptable form and level of involvement? How should the groups named in the legislation and "other entities" be selected? How can this be implemented at the state level? Or should it be a requirement at the local level?

Those who made serious attempts to comply with the legislation request that: (a) additional administrative resources be provided to implement the process (i.e., funds for transportation and per diem, for both staff and participants, -- in other words, planning grants), and (b) additional time to train "planning facilitators" at the local level who are seen as the key to local level planning.

C. Needs Assessment

The legislation requires the states to "identify the needs of the population of the state for services authorized under the title, ..." These groups include "all segments of the adult population in the state including residents of rural areas, residents of urban areas with high rates of unemployment, adults with limited English language skills, and institutionalized adults." In addition, various federal Acts indicate such other segments of the adult population which have been underserved in the past as: immigrants, elderly, handicapped, Indians and persons from other minority groups.

However, as is the problem with other components of the new requirements, no specific operational definitions of these groups or guidelines in the identification of them are provided. A clear, concise description of what is included in each group must be developed so that all states are operating under the same guidelines.

Since states have relied primarily on census data in the past to show the general need for assistance, most have not established the capacity to do a statewide needs assessment. Present census data do not provide adequate information regarding the nine special population groups, in particular the number and location of those in need of AE services. Most states object to doing a statewide needs assessment for two major reasons: (a) present funds do not provide for this type of survey; and (b) most believe there would be less than a 10% change in current statistics, and therefore little change in the population to be served.

The identification of a specific target group as well as an assessment of their specific needs will require additional resources (i.e., staff amd monies) and time. No one questions that greater percentages of the "special populations" would be served if they can be reached. However, most do question whether or not programs will have sufficient resources at the local and state levels to carry out an extensive assessment and outreach effort. All programs would appreciate assistance on cost-effective ways of determining the educational needs and of reaching the special population groups mentioned above.

The primary reason for carrying out a needs assessment is to determine the nature and extent of need for AE services among the specially targeted groups and others. In previous years, states were not required to keep records on participants according to the legislative categories. Their main effort in tracking the client population was to keep records of their race, age, sex, educational level and, to some extent, socioeconomic impact data. This was linited to the participants. Each state had a general target population of adults with less than a high school diploma, but additional data regarding "special groups" was not requested. Therefore, special assistance will be required on how to determine the target population in each of the Act's categories. All are to receive priority attention. But by what means can each groups' needs be determined in each state?

Highly relevant to this problem is the erosion of state AE administrative funds while the workload in terms of planning and reporting have and will steadily increase. It has been suggested

that if these administrative funds were increased, a more comprehensive and reliable population needs assessment could be conducted. All contend that with additional funds a larger percentage of the target population could be served.

D. Services Expansion

A direct followup to the needs assessment is the development of an extensive outreach network. Within this section of the Act lie some to the most controversial and difficult sections for SEA's to implement. State Directors in the seven states estimate they are presently serving only 3 or 4% of actual need, as indicated by State census data, with present funding levels.

With an increase in funding, a larger population could be reached. Recruitment is not a problem, but now they are being asked to emphasize the most difficult portion of the target population, "the least educated and most in need of assistance." Most contend that they already provide flexible course schedules at convenient locations and are already serving the target population.

During the initial months, many states interpreted the new "expansion of services" to mean serving more students at more locations without additional funds. Many were distressed with the mandatory spending limitations placed on adult secondary classes across the board. Most would like some flexibility built into this component to reflect the needs of each individual state.

All states will need information on effective techniques in reaching the Level I or "least educated and most in need of assistance." Both effective techniques as well as other resources must be made available if states are to reach this level of participant. Everyone frankly admits that because of the limited funds available for AE and each state's limited capacity to serve only a small percentage of those in need. they have not had to recruit vigorously in order to fill the classroom. A related problem which must be dealt with is providing training for teachers in techniques of working one-on-one with the "least educated and most in need of assistance." Everyone agrees that this group is most difficult to recruit, teach, and keep in the program.

A second aspect which created a major concern in the area of services expansion was the new legislative provision allowing local programs to be reimbursed for transportation and child care. The draft regulations saw the provision of the services as major ingredients in the renewed outreach effort. The point made in the legislation and the proposed regulations is that some of the "hard to reach" can not attend classes without these direct supports.

State Directors pointed out that although the legislation allows for reimbursement, no additional funds have been provided for these types of costs. Because of their fear that local programs may incur substantial expenditures in transportation and child care, the states have taken an extremely conservative position. Payment will be made only if local grantees can demonstrate that

all local resources have been mobilized and no other method of providing the service can be found.

The local grantee application in all cases will have to address the question of transportation and child care. Few, if any, states will require the local grantee to set aside AE funds for these services. In most cases, agreements will be negotiated with agencies already providing these services in the community.

The area is one in which TA is required. Innovative approaches to both child care and transportation will be welcomed by the State Directors.

E. Interagency Cooperation and Collaboration

The new amendments require the states to describe "the procedures...to ensure...there will be adequate consultation, cooperation, and coordination among the SEA...and other agencies... which operate employment and training programs...for adults."

According to several AE staff, requirements similar to those stated above are not new, nor are attempts to meet them. The major problem encountered was the lack of reciprocity on the part of the other agencies. Many felt that "linkages of communications need to be established at the federal level." Encouragement must originate from that level in order to promote the type of state and local cooperative and collaborative relationship specified in the new amendments.

A compounding problem is that in most states cooperation is on a personal basis and not through any specific policy mechanism. Therefore, when personnel changes in an agency occur, the cooperation may cease. In all states the A-95 process is followed perfunctorily but any real cooperation in either planning or service delivery is based on a personal working relationship between program and agency directors.

Through the participatory planning process, most states invited input from the various employment, education and training programs in the development of the State Plan. For several states, the new amendments simply required them to formalize what previously had been an informal process. The major objection that State Directors presented initially was that other federal programs such as Vocational Education and CETA would be setting AE goals and objectives while they (AE) would not be able to reciprocate.

While several states have cooperation in planning at the state level between one or more related programs, most of the cooperation among programs can be seen at the local level. At this level, the various programs are more likely to be coordinated in their delivery of services than at the state level because the same local grantee handles most of the programs sponsored by the state, including Vocational Education, Community Education, Bilingual Education, Right to Read and others. One of the major benefits which may be derived from

coordination at this level is an accurate compilation of data on all segments of the population. The more successful the local interagency cooperation, the greater the needs of the target population will be identified since all major target populations are probably being served in some form by one or more agencies in the community. However, suggestions and TA will be welcomed on ways of improving coordination of adult-related programs at both the state and local levels. Also, it was recommended that efforts be made to require related programs (CETA, Vocational Education, etc.) to "live up to" the kind of cooperative language that is fairly strong in the AE Act but not in others."

F. Non-LEA vs. LEA Grants

The most controversial amendment to the Adult Education Act is the one requiring the states to "describe the means by which the delivery of adult education services will be significantly expanded through the use of agencies...other than the public school system...". In some states the state legislature vests total responsibility for all education programs in the LEA. In all states studied, none embraced this requirement as being necessary. Everyone expressed the opinion that prior legislation allowed local grantees to reach out to the "hard to reach" through community non-profit organizations. Many believed that the process of acquiring funds must now be competitive, that the prior cooperation between LEA's and private non-profits will cease, and, that this will be to the detriment of the AE program.

However, several states have incorporated requirements which tend to minimize the competition between LEA and non-LEA organizations. Many states require the applicant to provide a percentage of matching funds which increase the costs of the local programs. In addition to coming up with a matching share, some states will require all applicants to demonstrate they have a "proven capability" to deliver educational services to adults. These applicants must show previous expenditures for students and can not rely on an all-volunteer effort to qualify in this respect. New procedures for reimbursement will also be initiated which do not allow for differences between poorer and richer jurisdictions. Each grantee will receive a flat rate based on average daily attendance. Further, in some instances, widening the grant competition will result in changes pertaining to teacher certification. In an effort to upgrade the quality of all teachers in AE, eligibility to receive funds will be related to teacher qualifications.

All of the criteria mentioned above work against non-LEA's receiving grant monies to operate their own program. In order to open the competition to non-LEA's, the following questions must be addressed: (1) How should SEA's involve non-LEA's in the delivery of AE services; (2) how should SEA's and LEA's involve non-AE individuals as planners of AE services; and (3) how should LEA's be consulted on or involved in the approval of non-LEA applications for AE programs?

This final question is important since, according to Section 304 of the Act, an LEA should be consulted or offer comments on the application for local AE services of another agency. Some SEA's were vehemently opposed to this change stating that, in the past, the SEA had total responsibility "for AE throughout the state and it is entirely up to the SEA to determine who the local delivery agencies for AE are to be." It appears that some "turf" problems have been created as a result of this amendment which should dissipate as coordinative linkages are created with other agencies. In order to develop the most appropriate AE service delivery agency in a community, several local agencies and organizations should be involved in the approval process. This authority and responsibility should not be left to one or two agencies which may exist outside of the community.

While these are state policy issues not directly amendable to TA, guidelines from USOE could undoubtedly help in future decision-making.

IV. RECOMMENDATIONS

Several recommendations have been formulated by DA as a result of observations and discussions regarding the State Plan development process. If implemented, these should result in the next round of planning: (1) having a clearer and more concise description of requirements and expectations, and (2) occuring within a more realistic and rational time frame. The following are the major recommendations.

1. Provide states with technical assistance in State Plan Development.
   The assistance received from the DAE state plan specialist (Gerry Randall) was appreciated and worthwhile. Due to the available time and resources, however, it was limited in both extent and depth. In preparing for the next round of three-year plans, DAE should provide a variety of types of assistance, using DAE staff, the state directors themselves, and other resources.

2. Clearly communicate to the states DAE organization, resources, and available technical support.
   Due to recentralization of the DAE regional staff, many State Directors and state AE staff continue to be confused regarding the DAE roles. There is a need for a detailed description of the office, with principal roles identified and type of services states can expect to receive, especially the types and extent of TA. A description of the DAE staff roles and responsibilities could be provided via an extensive memorandum or a foldout-type

brochure. In addition, this document should clarify the substance and form of the TA to be provided by DAE, as well as the form of requests for TA to be submitted by the states.

3. Prepare and distribute a suggested format for the three-year plan.

The absence of guidelines or standard format made many directors concerned over the DAE review process for the three-year AE State Plan. While each state asserted its right to develop its "own" plan, many felt the states' preparation tasks and DAE's reviews would be facilitated by a standard outline or format which also indicated what type of information is expected in each section. The provision of a standard format which includes specific guidance on goals, specifications for content, and evaluation standards for each planning section would help to reduce the need for repeated clarifications and alleviate the tremendous sense of frustration and alienation among the state AE staffs due to their not knowing what is expected.

In presenting the format, it is important to communicate clearly that it is optional -- as with the Zeigler participatory planning model, it should be offered in a spirit of technical assistance, not regulation. While the States want guidance, they also jealously guard their diversity and would resent and resist a rigidly imposed planning process or outline.

If it is judged that even a suggested format exceeds the USOE or legislative restrictions on influencing state planning,

an alternative would be for DAE to compile and circulate excerpts from the recently submitted plans. These might be examples of what DAE considers to be the "best" sections. The circular might also include some examples of sections which were rejected in order to show the acceptable range.

4. Develop a Manual or "Idea Book" dealing with implementing the new legislative mandates.

A complement, or possibly a substitute, for the "standard format" would be the development of a procedures manual. Two of the seven states specifically suggested that the DAE develop a "how to" manual which would provide practical suggestions for implementing each aspect of the legislation.

Each section would include helpful approaches to addressing the legislated requirements, reference materials, and a bibliography of key articles which discuss at greater length a particular issue. The guidance provided in the procedures manual would clarify what is expected, provide practical suggestions for implementation, and guidelines for evaluation. Sections might include some of the following areas: a) Needs Assessment - ways of assessing the specific need of the special population groups; b) Participatory Planning - state level and local level techniques of involving required groups in planning, goal setting, etc; c) Older Persons - outreach, motivation and individualized instruction; and d) Bilingual - etc. These areas plus many others could be dealt with in a procedures manual.

5. Embark on a systematic program of monitoring each of the states in terms of key elements of the state planning process and new legislation.

On a regular basis each of the states should be polled to determine the nature and level of their activity and their needs for assistance with respect to key elements of the state planning process and the new legislation. This might take the form of a telephone discussion once each quarter between DAE staff and State Directors focused on the following topics: (a) interagency coordination; (b) involvement of business and industry; (c) needs assessment; (d) participatory planning related activities; (e) coverage of special populations; and (f) special outreach activities.

Essentially, this monitoring effort would have three purposes. First, it would be a form of preparation for the next set of three-year state plans. It would regularly focus attention on key facets of the planning process and stimulate thinking, if not activity, in the areas of interagency coordination, broad participation, etc. Second, it would stimulate activity (i.e., compliance) with the terms of the new legislation and enable DAE to be in a position to provide relatively current status reports to Congress or others should they be requested. Third, it would enable DAE to play a clearinghouse role with respect to sharing information with the states and strengthen DAE's capacity to provide TA generally. In addition, if each of several DAE staff were assigned recurrent responsibility for several states (in addition to their regular duties), over

time they might become general contact points with the states and to some extent compensate for some of the lost benefits of the regional office system.

Operationally, this effort could be implemented by assigning existing staff the additional responsibilities of: (1) making several (5-10) telephone calls to State Directors once every three months to discuss key topics; (2) summarizing the conversations in a standard format; and (3) meeting together for a one to two-hour session to share information and impressions.

6. Immediately begin to develop time tables and technical assistance plans for development of the next round of three-year state plans. All State Directors (and DAE for that matter) strongly recommended a longer planning time period to develop a more comprehensive quantitative and qualitative AE plan. The tight deadlines forced the AE planners to "gear up" in a very short period of time and resulted in the quality of some state services being sacrificed. A more reasonable and realistic time frame would allow for (1) the synthesis of new material (i.e., new amendments, regulations), (2) implementation of DAE's TA strategies, (3) efficient and productive participatory planning, (4) conduct of comprehensive needs assessments, and (5) the involvement of all appropriate organizations and agencies in the development of an effective AE State Plan.

The beginning of a possible time table is presented below:

1979-80: Year 1 of Three-Year State Plan

- DAE clarify roles, services, etc.
- DAE begin regular monitoring of planning and compliance activities
- DAE develop State Plan format and procedures manual/ "idea book"
- Field test format and manual through State Plan update process
- Determine policy(s) regarding grants to states regarding State Plan development (planning grants)

1980-81: Year 2 of the Three-Year State Plan

- Continue monitoring and TA activities
- Special TA in area of participatory planning
- Revise and disseminate State Plan format and manual/ "ideal book"
- Develop planning grant procedures
- Make planning grant awards

1981-82: Year 3 of Three-Year State Plan

- Continue monitoring TA activities
- Special TA in area of planning process and plan preparation
- States implement and DAE monitor planning grants
- States prepare and submit/DAE reviews second round state plans

1982-83: Year 1 of New Three-Year State Plan

- States implement new plans
- DAE monitor and provide TA